

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
**SECURITIES AND EXCHANGE COMMISSION, :
Plaintiff, : 15 Civ. 9764 (WHP)
- against - : ECF Case
ATLANTIC ASSET MANAGEMENT, LLC, :
Defendant. :-----X**

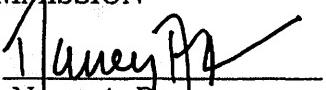
**NOTICE OF MOTION FOR AN ORDER APPROVING JOINTLY PROPOSED
PLAN OF DISTRIBUTION AFTER NOTICE TO INVESTORS AND CREDITORS OF
PLAINTIFF SECURITIES AND EXCHANGE COMMISSION AND MARTI P.
MURRAY, AS RECEIVER FOR ATLANTIC
ASSET MANAGEMENT LLC**

PLEASE TAKE NOTICE, that upon the Declaration of Nancy A. Brown, executed July 6, 2016, and the Exhibit thereto, the Proposed Order and the Memorandum of Law in Support of the Motion, and the prior proceedings had herein, the Plaintiff Securities and Exchange Commission (“Commission”) and Marti P. Murray, as Receiver of Atlantic Asset Management, LLC (the “Receiver,” and together with the Commission, the “Proponents”), will move this Court, at a date and time to be determined by the Court, before the Honorable William H. Pauley, III, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, to enter an Order approving the jointly Proposed Plan of Distribution of the Commission and Receiver after notice to investors and creditors, submission

of objections, if any, and a hearing; and such other and further relief as the Court may deem just and proper.

Dated: New York, New York
July 6, 2016

SECURITIES AND EXCHANGE
COMMISSION

By: 
Nancy A. Brown
Brookfield Place, 200 Vesey Street
Suite 400
New York, New York 10281
Tel: (212) 336-1023 (Brown)

Attorneys for the Plaintiff

KLESTADT WINTERS JURELLER
SOUTHARD & STEVENS, LLP

By: 
Tracy L. Klestadt
Joseph C. Corneau
200 West 41st Street, 17th Floor
New York, New York 10036
Tel: (212) 972-3000
Fax: (212) 972-2245

Attorneys for the Receiver